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15	NODTHEDN DISTRI	ICT OF CALIFORNIA
16	NORTHERN DISTRI	ICI OI CALIFORNIA
17		
	JOE PERVOE, individually and as successor in	CASE NO.: 4:12-cv-04286 JST
18	interest to John Wayne McGee, and CAROLYN COPELAND, individually,	
19	COLECAND, murvidually,	
20	Plaintiff,	STIPULATION REGARDING MOTION TO
20	V.	COMPEL DEADLINE; [PROPOSED] ORDER
21	RYAN SWETAVAGE, an individual; MIGUEL	ONDER
22	IBARRA, an individual; LONALA KAHO'ALI'I, an individual; ANDREA	
23	NEDEROSTEK, an individual; TRAVIS	
	HIGGINS, an individual; DEREK MEZA, an individual; CHRISTOPHER HAENDEL, an	
24	individual; ALBERTO-ANDRES HOLMES, an	
25	individual; JOHN TOWNSLEY, an individual;	
26	THOMAS NELSON, an individual; and DOES 1-50, inclusive, in their capacities as Sheriff's	
	Deputies for the COUNTY OF ALAMEDA,	
27	Defendants.	
28		
- 1	I	

1 **STIPULATION** 2 WHEREAS, the parties have proceeded with conducting discovery in the instant action; 3 WHEREAS, the parties previously submitted to the Court a Stipulation Regarding ADR, 4 Expert Witness Designations, and Fact Discovery on February 2, 2015, to extend the completion of 5 fact discovery; 6 WHEREAS, the Court ordered the close of fact discovery extended to March 5, 2015, such that Plaintiffs' should respond to Defendants' contention interrogatories by the close of fact 8 discovery; 9 WHEREAS, the parties have met and conferred regarding Plaintiffs' discovery responses 10 and Plaintiffs' agreed to supplement their responses, including contention interrogatories 11 responses; 12 WHEREAS, Plaintiffs' failed to provide supplemental responses to Defendants' contention 13 interrogatories and other fact discovery by March 5, 2015; 14 WHEREAS, pursuant to Civil L.R. 37-3 Defendants' deadline to file a motion to compel 15 further responses to their discovery requests is March 12, 2015; 16 WHEREAS, Plaintiffs' counsel has assured Defendants' counsel that Plaintiffs' 17 supplemental discovery responses will be served on March 11, 2015; 18 WHEREFORE, the parties respectfully request that the Court's scheduling order in this 19 action be modified to allow the Plaintiffs' time to serve supplemental discovery responses and so 20 that Defendants may have sufficient time to review the responses prior to expiration of the motion 21 to compel deadline, by: 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

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1	1. Extending the motion to compel deadline to April 2, 2015, such that Plaintiffs can	
2	meaningfully respond to Defendants' contention interrogatories and other fact discovery by March	
3	13, 2015.	
4	Respectfully submitted,	
5	Dated: March 11, 2015 THE LAW OFFICES OF JOHN L. BURRIS	
6	/s/ Benjamin Nisenbaum	
7	Benjamin Nisenbaum Attorney for Plaintiff	
8	Dated: March 11, 2015 BERTRAND, FOX, ELLIOT, OSMAN & WENZEI	
9	/s/ Michael Wenzel	
10	Michael Wenzel	
11	Attorney for Defendants	
12	[PROPOSED] ORDER	
13		
14	GOOD CAUSE SHOWN, the Court hereby orders as follows:	
15	1. The motion to compel deadline is hereby extended to April 2, 2015, such that	
16	Plaintiffs shall respond to Defendants' contention interrogatories and other discovery by March 13,	
17	2015.	
18	IT IS SO ORDERED.	
19	Dated: March 11, 2015 Dated: March 11, 2015	
20	Dated: March 11, 2015	
21		
22	Z Judge Jon S. Tigar	
23		
24	FEERN DISTRICT OF CE	
25	OISTRIC!	
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